IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

JANET L. BROWN

: CASE NO. 1-16-01079-HWV

Debtor : CHAPTER 13

:

CHARLES J. DEHART, III CHAPTER 13 TRUSTEE

Movant

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JANET L. BROWN

Respondent

<u>DEBTOR'S OBJECTION TO CERTIFICATION OF DEFAULT</u> FILED BY CHARLES J. DEHART, III, CHAPTER 13 TRUSTEE

AND NOW, comes Debtor, Janet L. Brown, by and through her attorney, Gary J. Imblum, and respectfully represents as follows:

- Debtor filed a Chapter 13 Bankruptcy to the above term and number on or about March 16, 2016.
- On December 3, 2020 the Chapter 13 Trustee, Charles J. DeHart, III filed a
 Certification of Default indicating that Debtor is behind on her payments in the amount of \$343.39.
- Debtor is mailing a payment to the Trustee in the amount of \$343.39 on December
 7, 2020.

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WHEREFORE, Debtor respectfully requests that this Honorable Court refrain from entering an Order dismissing Debtor's case in the above matter.

Respectfully submitted,

Gary J. Imblum

Attorney I.D. No. 42606

4615 Derry Street

Harrisburg, PA 17111

(717) 238-5250

Fax No. (717) 558-8990

gary.imblum@imblumlaw.com

Attorney for Debtor

DATED: 12-7-20

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S OBJECTION TO CERTIFICATE OF DEFAULT FILED BY CHARLES J. DEHART, III, CHAPTER 13 TRUSTEE upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE CHAPTER 13 TRUSTEE VIA E-SERVICE

dehartstaff@pamd13trustee.com

Respectfully submitted,

Carol V. Shay, Paralegal Imblum Law Offices, P.C.

4615 Derry Street Harrisburg, PA 17111

(717) 238-5250

Fax No. (717) 558-8990

gary.imblum@imblumlaw.com

For Debtor

DATED: 12/1/2020